

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JEAN JADEL ALEXANDRE,

Petitioner

v.

STEVEN FARQUHARSON, DISTRICT
DIRECTOR, U.S. BUREAU OF
IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Respondents

Civil Action No.
03cv12357-PBS

RESPONDENT'S EX TEMPORE
REPRESENTATION OF NON-DEPORTATION

Respondent¹ has been informed by the Clerk of Court of the filing of a petition for writ of habeas corpus and stay request, and that it has been represented to the Clerk that petitioner will be deported over the weekend.

Counsel for respondent has not been served by petitioner with the petition or stay request, and has not been otherwise contacted regarding this case. Nor does the petition faxed to the undersigned as a courtesy by the Clerk indicate any such service.

In fact, petitioner is not scheduled for deportation over the weekend, and for practical reasons petitioner's

¹ Former INS District Director Steven Farquharson is no longer employed by the Department of Homeland Security, Bureau of Immigration and Customs Enforcement ("ICE"), but has taken a different position with the Bureau of Citizenship and Immigration Services ("BCIS"). As of a DHS restructuring effective June 9, 2003, it is understood at present that the responsive successor official of the Department of Homeland Security in the instant action is Bruce Chadbourne, Interim

Nov-22-03 03:50am From-

deportation order cannot be executed any earlier than at least one month from today.

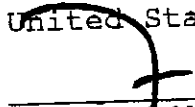
Respondent therefore represents to this Court that it will not execute the deportation order against petitioner any earlier than December 21, 2003, and in addition will also provide the Court with at least 48 hours (two business days) advance notice of any scheduled deportation.

Unless otherwise directed by the Court, respondent will proceed in this case by filing a response to the action in the normal course.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


FRANK CROWLEY
Special Assistant U.S. Attorney
Department of Homeland Security
P.O. Box 8728
J.F.K. Station
Boston, MA 02114
(617) 565-2415

Field Director for Detention and Removal, Bureau of
Immigration and Customs Enforcement in Boston, Massachusetts.

Nov-22-03 03:51am From-

CERTIFICATE OF SERVICE

I hereby certify that I caused true copy of the above document to be served upon counsel for petitioner by mail on November 21, 2003.

FRANK CROWLEY
Special Assistant U.S. Attorney
Department of Homeland Security
P.O. Box 8728
J.F.K. Station
Boston, MA 02114

Nov-22-03 03:50am From-



U.S. Department of Homeland Security
U.S. Immigration and
Customs Enforcement

Office of the Chief Counsel
JFK Federal Building, Room 425
Government Center
Boston, Massachusetts 02203

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FACSIMILE TRANSMISSION COVER SHEET
DHS/ICE OFFICE OF CHIEF COUNSEL
(617) 565-3140- TELEPHONE

DATE: 11/21/03

TO: Michelle Rynne, Deputy Clerk

OFFICE: Honorable Douglas P. Woodlock

FROM: FRANK CROWLEY, DHS/ICE, Boston, MA (617-565-2415)

Attached is Respondent's representation of non-deportation for at least one month, and representation of prior notice thereafter.

Thank you,

Frank Crowley
Special Assistant U.S. Attorney